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FORM NO.
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(47)

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21 February 1985

MEMORANDUM FOR: See Distribution

FROM: AC/IHC

SUBJECT: Informal Comments on OMB Draft Circular No. 85

1. I am attaching herewith for your information comments which I delivered to OMB today, 21 February. This was drafted after consultation with [redacted] of SECOM and was reviewed by [redacted] PPS had stated that they did not desire to offer any comments.

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2. Some minor changes have already been made to the original draft which we supplied to you previously. As soon as we receive copies of the revision for distribution we will forward them to you.

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Attachment: a/s

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DIRECTOR OF CENTRAL INTELLIGENCE
Intelligence Information Handling Committee
WASHINGTON, DC 20505

IHC/MM 85-17
21 February 1985

MEMORANDUM FOR: Steve Dodson
Office of Management and Budget

FROM:

[REDACTED]
Acting Chairman, Intelligence Information
Handling Committee

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SUBJECT: Informal Comments on Draft OMB Circular No. 85

1. In the TDY absence of [REDACTED] the Intelligence Community (IC) Staff representative to the SAISS, I am submitting to you herewith informal comments on the Draft Bulletin No. 85 distributed at the last meeting of the SAISS. Because of time constraints, we are not able to present a fully coordinated IC Staff position on all of the issues raised by the proposal, but we wished to send what we intend as constructive suggestions as to how the draft might be clarified and improved as soon as possible. If we receive further comments we will forward them to you on receipt.

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2. We think the draft proposal represents an excellent initial basis for beginning to gather the data required as a result of NSDD-145, especially in view of the limited time available to prepare the draft. Nevertheless, we believe that some clarification and modification of the classifications of the term "computer installations" will result in more uniform and useful data being submitted in accordance with the purposes of the data call.

3. As paragraph 1 of the draft states, the purpose is to gather data on automated information systems, not on isolated CPUs. Nevertheless, the classification scheme as it now stands seems to place the focus on individual processing units or computers, regardless of how they may be interconnected into systems. Furthermore, the allocation of microcomputers to the same category as minicomputers appears to be confusing and could result in misleading aggregations of data. Therefore, we strongly recommend that paragraph 4b be amended in part to read as follows:

. . . "More specifically, computer installations are classified in Exhibits 1 and 2 as:

- Category 1. Stand-alone word processors.
- Category 2. Stand-alone personal computers.
- Category 3. Minicomputers and associated peripherals or word processors, personal computers or microcomputers connected to form an integrated system.
- Category 4. Mainframes and associated peripherals, either stand-alone or connected to form an integrated system."

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Our rationale for these changes is as follows:

a. Word processors are more and more being linked together to form coordinated processing systems or being used as intelligent terminals as part of larger systems. It does not make sense to treat word processors being used in this way differently from personal computers. For purposes of risk analysis and accreditation they should usually be considered as part of the larger system to which they are attached and not as isolated installations. The present wording of the draft strongly implies a different treatment.

b. We see no rationale for including microcomputers in a category with minicomputers. They are more akin (if not identical with) personal computers unless they are embedded in a larger system, in which case they should not be separately treated at all.

c. We believe that wording should be added to Category 4 to make it clear that when two or more mainframe CPUs are closely connected so as to form a single processing system they should not be treated as separate entities for the purposes of risk assessment, accreditation or accounting.

4. In order to conform the language included in Exhibits 1 and 2 to the above proposed changes to the definitional section, we suggest the following labeling of the reporting categories on the exhibits:

"Category 1 - Stand-alone Word Processors.

Category 2 - Stand-alone Personal Computers.

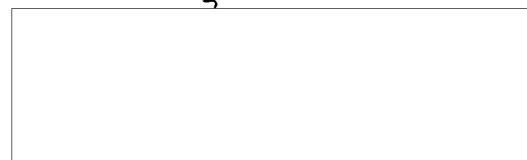
Category 3 - Minicomputers or Systems of Word Processors, Personal Computers, or Microcomputers.

Category 4 - Mainframes and Associated Peripherals."

In addition we suggest that the forms include a footnote to Categories 3 and 4 to read as follows:

"Linked or networked computers should be enumerated in the same way as they are accredited, i.e., if individually accredited, they should be counted as individual computer installations. If the system is accredited as a unity, then only the system should be counted."

5. While we think that the Computer-Security Budgetary Resources called for in Exhibit 3 can be supplied by elements of the Intelligence Community in the aggregated terms proposed, some reporting will have to be appropriately classified and will only be able to be reported in unclassified form if the source is not separately identified and it is included as part of larger aggregations.



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